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 Attorney for Plaintiff Julie Hanna

UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

* * *

JULIE HANNA,

Plaintiff,

vs.

K-KEL, INC.. a Nevada Corporation; DOES I-
 X; and, ROE Business Entities I-X, Mark
 Broadhurst, Mike York, and Chase Swanson.
 Defendants.

Case No.: 2:21-cv-00639-JCM-BNW

Stipulation and Order to Extend Deadline for
 Discovery Period

[Third Request]

Pursuant to Local Rules 6-1 Defendant K-Kel, Inc. (“Defendant”) and Plaintiff Julie Danou Hanna (“Plaintiff”), by and through their undersigned counsel, hereby stipulate to amend the Order Granting Stipulated Extension of Deadlines (ECF No. 33) as follows:

Expert Disclosure Deadline	April 9, 2022
Rebuttal Expert Disclosure Deadline	May 9, 2022 ¹
Discovery Deadline	June 8, 2022
Dispositive Motion Deadline	July 8, 2022
Joint Pretrial Order Deadline	August 8, 2022 or 30 days from a ruling on a dispositive motion

¹ However, the parties have agreed that any defense rebuttal expert report relating to the report of Plaintiff’s expert, Ryan S. Shugarman, will be submitted by April 9, 2022.

1 This is the third request for an extension to the discovery plan and scheduling order in this
2 matter. The requested extension is sought in good faith and not for purposes of undue delay.

3 **DISCOVERY COMPLETED TO DATE**

4 The parties have exchanged initial disclosures pursuant to FRCP 26(a)(1). Plaintiff has served
5 written discovery upon the Defendant, and Defendant has provided responses. Defendant has served
6 written discovery on Plaintiff and responses are not yet due. Defendant has subpoenaed five sets of
7 medical records. Plaintiff has served an expert witness report and Defendant has identified an expert it
8 would like to use. The parties have agreed that the Plaintiff's responses are due February 14, 2022, and
9 February 16, 2022. Plaintiff has noticed depositions for February 16, 17, and March 1, 2022.

10 **DISCOVERY REMAINING**

11 The deposition of Plaintiff and other parties, current and former employees of Defendant,
12 experts and potentially other persons, as well as possible further written discovery.

13 **REASON FOR EXTENSION OF DISCOVERY**

14 In addition to general complications from dealing with the global pandemic and restrictions of
15 COVID-19, Plaintiff's contested motion to file a First Amended Complaint was granted on January 20,
16 2022 (ECF No. 39), adding three individual defendants to the case. It was prudent that depositions not
17 proceed until it was resolved whether new parties would be added. Also, these parties need to be served
18 before any discovery can be taken from them. As for the rebuttal expert deadline, Defendant has
19 identified a rebuttal expert it would like to use, but that person could not prepare a report within the
20 existing deadline due to his schedule, and not all medical records of Plaintiff have been produced yet in
21 response to the subpoenas that have been propounded.
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PROPOSED DATE FOR THE COMPLETION OF DISCOVERY

The parties presently believe they can complete discovery by the proposed new date of June 8, 2022.

Respectfully submitted,

DATED 1/28/2022

/s/ Kathryn Black
Kathryn Black, Esquire
Pro Hac Vice Admission
Attorney for Plaintiff

/s/ Scott Mahoney
Scott Mahoney, Esquire
Nevada Bar No. 1099
Attorney for Defendant

ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

Dated: January 31, 2022

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